



## State of New Jersey

Department of Environmental Protection

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March 7, 2009

Patricia Simmons Pierre  
United States Environmental Protection Agency  
Region 2  
290 Broadway  
New York NY 10007-1866

Re: Remedial Investigation Workplan MW-19/Hot Spot 1 AOC  
L E Carpenter  
170 North Main St  
Wharton, Morris County  
SRP PI# 003017  
Activity Number Reference: RPC060001

Dear Ms. Pierre:

The New Jersey Department of Environmental Protection (Department) has completed review of the Remedial Investigation Workplan dated November 14, 2008, submitted pursuant to CERCLA and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (Tech Rules).

The Department's comments on the submittal are provided below.

### Comments

#### *1. Building 9 Management, page 4-1*

The document states that the activities proposed for the delineation of the suspected residual sources under and adjacent to Building 9 will take place following the demolition of Building 9. Building 9 will be demolished and all materials removed including floor slabs, footers and sub-basement. As part of the planned demolition, it may be advisable to leave the concrete floor or slab in place following the raising of

281850





Building 9. The Building 9 structure has been acting as an effective cap over a significant area of the residual source. DEP understands that it is practicable to remove the Building 9 structure.

LEC should consider leaving the concrete foundation/flooring in place until an appropriate remediation for the residual source has been selected.

2. *Remaining Sources, Lateral and Vertical Delineation Boring Sampling Plan, page 4-2*  
The document states that the data collection objective for the remaining sources is to determine the extent of residual BTEX and DEHP LNAPL for ultimate remediation decisions. NJDEP has generated and promulgated new and revised soil remediation standards (SRS). The Remediation Standards Rules, N.J.A.C. 7:26D-1.1, require that site-specific soil remediation standards be developed that are protective of ground water. A site-specific impact to ground water (IGW) soil remediation standard must be developed for the LE Carpenter site since a number of discharges to soil have been confirmed.

The guidance for developing a site specific IGW should be reviewed at [http://www.state.nj.us/dep/srp/guidance/rs/igw\\_intro.htm#](http://www.state.nj.us/dep/srp/guidance/rs/igw_intro.htm#) . If the data is not sufficient to develop an IGW number, then additional soil sampling may be required.

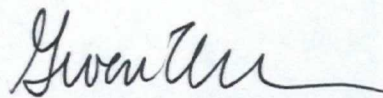
3. *The Oil-N-Soil method* may be appropriate for screening purposes to determine the presence of NAPL or a separate phase contaminant. The use of the technology for this purpose is acceptable, however the appropriate number of confirmatory lab samples must be collected to verify the results of the field screening. The NAPL screening tools do not provide any indication of the actual contaminant levels in soil and groundwater. The screening tools merely provide a qualitative indication of whether or not NAPL is present. Also, no lower detection limit is specified for the technology.

The final delineation of contamination in soil at the Building 9 source areas must be completed using traditional soil collection methods and the results compared to the Site Remediation Standards. (Refer to: <http://www.state.nj.us/dep/srp/regs/rs/>).

Please incorporate these comments into the letter that the USEPA will be sending to LE Carpenter.

If you have any questions regarding this matter contact Glenn Savary Case Manager, at (609) 633-0835, or at [glenn.savary@dep.state.nj.us](mailto:glenn.savary@dep.state.nj.us), prior to the date indicated.

Sincerely,



Gwen Zervas, P.E., Section Chief  
Bureau of Case Management



cc: George Blyskun, BGWPA  
John Prendergast, BEERA  
Health Officer, Wharton  
Clerk, Wharton